

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:
	: Case No.: 20-11291
Marcus A Little	: Chapter 13
Shanyel Little AKA Gibson-Little	: Judge Magdeline D. Coleman
Debtor(s)	: *****

**OBJECTION OF WELLS FARGO BANK, N.A., D/B/A WELLS FARGO AUTO TO
CONFIRMATION OF THE PLAN (DOCKET NUMBER 9)**

Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Marcus A. Little and Shanyel Little AKA Gibson-Little (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a lien on Debtor's personal property commonly known as a 2008 Buick Lacrosse with the Vehicle Identification Number 2G4WD582381150794 ("Property").
2. Creditor has filed Proof of Claim number 7 in the amount of \$4,041.46.
3. Debtor's Plan seeks to improperly cramdown Creditor's lien to a secured value of \$1,000.00 at an interest rate of 5.25%.
4. As of the bankruptcy petition filing date, Creditor believes the Property had a value of \$5,225.00.
5. Pursuant to 11 U.S.C. §506, Creditor is entitled to a secured claim based on the replacement value of the property on the date the bankruptcy was filed. Creditor requests an opportunity to conduct a full appraisal of the Property.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection of Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto to the Confirmation of the Original Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Chapter 13 Trustee, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Brad J. Sadek, Attorney for Marcus A Little and Shanyel Little AKA Gibson-Little, Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on April ____, 2020:

Marcus A Little and Shanyel Little AKA Gibson-Little, 3128 N. Spangler Street, Philadelphia, PA 19132

Marcus A. Little and Shanyel Little, 604 Wellfleet Drive, Middletown, DE 19709

Marcus A Little and Shanyel Little AKA Gibson-Little, 3128 N. Spangler Street, Philadelphia, PA 19132

Marcus A. Little and Shanyel Little, 604 Wellfleet Drive, New Castle, DE 19709

DATE: April 22, 2020

/s/ Karina Velter

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